INTEREST OF AMICI CURIAE

The NOW Legal Defense and Education fund (NOW LDEF) is a not-for-profit civil rights organization that performs a broad range of legal and educational services in support of women's efforts to eliminate sex-based discrimination and secure equal rights. NOW LDEF was founded in 1970 by leaders of the National Organization for Women, a membership organization of over 170,000 women and men in more than 725 chapters throughout the country. Family law, and in particular the economic rights of women in the family sphere, are a major focus of NOW LDEF's work. The organization has filed amicus curiae briefs on family law issues in numerous cases in state and federal courts. Cases in which NOW LDEF has filed amicus curiae briefs before this Court include Hisquierdo v. Hisquierdo, 439 U.S. 572

(1979), and McCarty v. McCarty, 453 U.S. 210 (1981).

J. Joseph Curran, Jr., Attorney General of Maryland, joins this brief amici curiae because the position it takes is substantially consistent with the position taken by the State of Maryland in related litigation in which it is directly involved. Maryland Dep't. of Human Resources v. U.S. Dep't. of Health and Human Services, 648 F. Supp. 1017 (D.C. Md. 1986), appeal pending, No. 86-3076 (4th Cir.) In that case, the U.S. Court of Appeals for the Fourth Circuit has placed the appeal in abeyance pending disposition of the instant cases in the United States Supreme Court. The Attorney General's interest as amicus curiae is specifically related to his concern, placed before the United States District Court in the case cited above, that the federal policy in issue requires the State to disrupt and undermine its own orderly child

support scheme. State support orders, and the statutes on which they are based, contemplate that support awards are to be fixed in relationship to the ascertained needs of the child on whose behalf they are paid, not his or her siblings.

The Association for Children for Enforcement of Support, Inc. (ACES) is dedicated to assisting disadvantaged children affected by parents who fail to meet legal and moral child support obligations. ACES has chapters in thirty states and has a total membership of over ten thousand.

The Center for Constitutional Rights (CCR) is a non-profit litigation and educational organization. Founded in 1966 to provide legal support during the southern civil rights movement, CCR has been a national resource for civil rights and social justice. Securing economic justice, especially for poor

women and their children, is a priority for CCR.

The Center for Law and Social Policy is a public-interest law firm which works to improve the plight of America's low-income families with children. The Center's efforts focus on the development of a non-discriminatory employment system and a fair and equitable public benefits system complemented by a more effective system of child support enforcement. The Center serves custodial parents and children who, like the plaintiffs in Bowen v. Gilliard and Kirk v. Gilliard, are adversely affected by the sibling deeming provisions of Section 402(a)(38) of the Social Security Act. The Center also serves non-custodial parents whose efforts at supporting their children are undermined by Section 402(a)(38).

The Child Support Action Network (CSAN) is a parents' advocacy group for child support

enforcement. The primary goals of the organization are: (1) to educate and support those who must personally deal with the child support enforcement system; (2) to promote increased accountability at federal, state, and local levels in enforcement of court-ordered child support; and (3) to develop increased visibility and public awareness on the issue of non-support. The organization opposes the practices of requiring non-needy children in a household to assign their child support income to the state, a practice which is challenged in the present case.

Connecticut Women's Educational and Legal Fund (CWEALF) is a non-profit public interest law firm that combines legal strategies with community education and training to advocate for women's rights. CWEALF also provides a telephone information and referral service to respond to questions about sex discrimination and other legal issues of concern to women.

Almost three-quarters of the callers to the information and referral service have family law concerns, including child support.

Custodial Advocates Seeking Enforcement of Child Support is a self-help organization founded in January 1986. The goals of the 200-member organization are (1) to ensure the enforcement of the laws pertaining to child support; (2) to assist others in learning about these laws; and (3) to provide information and resources.

Equal Rights Advocates, Inc. (ERA) is a San Francisco-based nonprofit legal and educational corporation dedicated to enforcing and promoting equal rights under the law for women. ERA has a long history of activism in the courts and community on issues that affect women's ability to support themselves and their families. This work includes filing amicus briefs before this Court on issues affecting women's economic status, advocating

for a fair minimum wage, and educating women about their legal rights.

The National Association of Social Workers (NASW), a non-profit professional association with over 100,000 members, is the largest association of social workers in the United States. It is devoted to promoting the quality and effectiveness of social work practice and to alleviating or preventing sources of deprivation, distress and strain which impact recipients of social work services. NASW believes that the practice of "sibling deeming" further weakens many families receiving AFDC, penalizing them financially, discriminates against independently supported children who live with needy siblings and creates potentially damaging intra-familial strains in families which are already vulnerable.

The National Conference of Black Lawyers (NCBL) is an association of lawyers, scholars,

judges, legal workers, law students and legal activists. The purpose of NCBL is to enhance professional strength and skill for the benefit of the Black community in its struggle for full economic, social and political rights. NCBL has chapters throughout the United States and in Canada and the Caribbean.

The National Council of Jewish Women (NCJW) was founded in 1893. It is an organization made up of over 200 sections across the country which are active in advocacy and community services. NCJW is the oldest major Jewish women's organization in the United States, and its members are volunteers dedicated in the spirit of Judaism to the advancement of human welfare and the democratic way of life.

Northwest Women's Law Center ("Law Center") is a non-profit, membership-supported organization based in Seattle, Washington, that seeks to advance the rights of women

through law. Founded in 1978, the Law Center conducts education and information and referral programs to advise women in the Pacific Northwest of their legal rights. It also sponsors litigation in all areas involving women's rights, including cases in the family law and public entitlement areas. One of the Law Center's current priorities is to work toward relieving the economic problems suffered by women and children as a result of divorce, especially in the area of child support.

Parents Against Non Support is a non-profit social welfare organization whose members include single parents, spouses, parents who pay their child support, grandparents, and taxpayers who are aware of the problem of non support. The organization has approximately 300 members in California. It works with elected state officials and the family support office to improve child support

enforcement legislation and public awareness of the child support issue.

Parents Organized for Support Enforcement, Inc. (POSE) is a Tennessee based child support advocacy organization. POSE is a member of the Parents Without Partners Child Support Network and the National Children's Advocacy Coalition. POSE was founded in April 1985.

Parents Without Partners (PWP) is a nonprofit membership organization of 180,000 single parents based in 1000 chapters located in all 50 states, Canada and Switzerland. It was founded in 1957 in New York City to further the welfare and interests of single parents and their children, and presently is headquartered in Silver Spring, Maryland. PWP educates its members through chapter activities and publications, and advocates on behalf of single parents through a variety of activities. PWP is concerned that children

entitled to child support receive all such support, and that their non-custodial parents paying child support are entitled to have that support used for their own children.

The People Organized for Support Enforcement (POSE) is a non-profit organization composed of men and women concerned with child support enforcement. There are approximately 250 members in the Chattanooga, Tennessee area. POSE is committed to the right of children to be supported by both parents, and is deeply concerned about the plight of children being thrust into poverty at alarming rates throughout the nation.

Single Parents United 'N' Kids (SPUNK) is a non-profit organization comprised of men and women concerned with child support enforcement. The purpose of SPUNK is to inform and educate custodial parents about their rights, including existing and proposed legislation on the federal and state levels, and to bring

knowledge of the problem to the public's attention, while attempting to reinforce existing child support laws. The organization has over 300 members, including at least one mother who is an AFDC recipient and is directly affected by the practices challenged in Bowen v. Gilliard.

The Sisterhood of Black Single Mothers is a national self-help organization founded in 1973. The goal of the organization is to address the concerns of single mothers and thereby enhance the Black community at large.

Women Employed is a national organization based in Chicago with a membership of 3000. For the past 14 years, the organization has assisted thousands of women with problems of sex discrimination and achieving economic equity. Women Employed is currently working on analyzing state and national welfare policies and proposing reform measures.

The Women's Equal Rights Legal Defense and Education Fund (WERLDEF), Gloria Allred, President, is a California non-profit corporation dedicated to educating women about their legal rights and helping them to vindicate those rights by providing access to the courts. WERLDEF has a longstanding interest and involvement in child support issues, has sponsored many seminars and workshops on child support, and has been involved in planning and implementing innovative child support programs in the state of California.

The Women's Equity Action League (WEAL) is a national, non-profit membership organization specializing in economic issues affecting women, and sponsors research, educational projects, litigation and legislative advocacy. WEAL is committed to the full and effective enforcement of public benefits laws at both federal and state levels to assure that all

economic opportunities are available to women as well as men.

The Women's Law Project is a non-profit feminist law firm dedicated to improving the status and opportunities of women through litigation and public education. The majority of women assisted by the Women's Law Project are poor, and the Women's Law Project is concerned about the effect of "sibling deeming" in further undermining the economic status of low income women and their children. Moreover, the Women's Law Project believes that the sibling deeming rules at issue here will seriously erode child support enforcement efforts, with the result that yet more women and their children will be reduced to poverty.

The Women's Legal Defense Fund (WLDF), a nonprofit membership organization based in Washington, D.C. was founded in 1971 to assist women in their efforts to gain equality under the law. In response to numerous requests for

assistance on matters relating to child support, WLDF has instituted the Project to Implement Strategies to Equalize Child Support Responsibilities. Through this and other programs, WLDF provides technical assistance to attorneys, engages in nationwide fact gathering, analyzes current and proposed legislation and provides representation at the appellate level. In addition, WLDF worked closely with Congressional staff on the passage of the Child Support Amendments of 1984, and submitted comments on the implementing regulations proposed by the Department of Health and Human Services. In September, 1986, WLDF sponsored a three-day conference on child support guideline development as part of WLDF's ongoing involvement in guideline development throughout the nation.